

Meeting Minutes  
Inter Agency Management Integration Team (IAMIT)  
EPA Conference Room  
712 Swift Blvd., Richland  
August 27, 1996

Appvl.: *C. A. Hansen* Date: 9/24/96  
C. A. Hansen, RL  
IAMIT Representative

Appvl.: *D. R. Sherwood* Date: 9/24/96  
D. R. Sherwood, EPA  
IAMIT Representative

Appvl.: *Michael A. Wilson* Date: 9/24/96  
M. A. Wilson, Ecology  
IAMIT Representative

Prepared by *F. T. Calapristi* Date: 9/24/96  
Appvl.: F. T. Calapristi  
F. T. Calapristi  
Westinghouse Hanford Company

Attendees

Alexander, S. M.	Ecology	B5-18	Horhota, M. J.	WHC	B1-16
Arnold, L. D.	WHC	B2-35	Jackson, D. E.	RL	A5-15
Bartz, J. K.	Ecology	B5-18	Kinmark, J.	Ecology	B5-18
Bengtson, P. J.	WHC	B3-35*	Rasmussen, J. E.	RL	A5-15
Blazek, M. L.	WHC		Sanders, G. H.	RL	A5-15*
Calapristi, F. T.	WHC	B2-35*	Selby, M. A.	Ecology	B5-18*
Carter, P.	RL	S7-55	Sherwood, D. R.	EPA	B5-01*
Clark, C.	RL	A5-15	Skinnarland, R.	Ecology	B5-18*
Darling, N.	WHC	H6-21	Stanley, R.	Ecology	Lacey
Farwick, D.	WHC	B1-16	Wilson, M. A.	Ecology	B5-18*
Faulk, D.	EPA	B5-01	Yokel, J.	Ecology	B5-18
Haass, C. C.	RL	S7-51	EPIC		H6-08*
CC:					
Mecca, J. E.	RL	R3-79	Piper, L. L.	RL	A5-11

\* W/Attachments

IAMIT27.AUG

**Inter Agency Management Integration Team  
EPA Conference Room  
712 Swift Blvd., Richland  
August 27, 1996**

IAMIT Representatives: Doug Sherwood, Mike Wilson, Charlie Hansen  
WHC Tri-Party Agreement Integration: Larry D. Arnold  
Recorder: Frank T. Calapristi

**1. Approval of June Meeting Minutes**

The IAMIT reviewed and approved the minutes of the July 23, 1996 meeting as written.

**2. Approval of the FY 1997 IAMIT Meeting Schedule**

A proposed FY 1997 IAMIT Meeting Schedule (Attachment 1) was submitted to the IAMIT for review. After a short discussion, the FY 1997 meeting schedule was approved.

**3. IAMIT Directive: DOE/RL and Regulator TPA Milestone Presentations**

An IAMIT Directive (Attachment 2) which was reviewed at the July meeting; has been approved by the three agencies. The directive requires the RL and regulatory project managers to participate in the preparation of the TPA milestone presentation. RL will make the presentation followed by a regulator perspective of the milestone status. Both parties will have prior knowledge of each others presentation.

**4. Summary of Negotiation Issues and Schedules**

- **K Basins**

RL reported good progress to date in the negotiations. An AIP was signed two weeks ago and the next negotiation is scheduled for September 28, 1996, which will discuss PCB's and include transition and TWRS personnel. The negotiations will focus on three areas:

- a. Facilities required
- b. Basins
- c. Sludges

It was noted the plan is to transfer K Basins to ER after transition is completed.

- TWRS HLW Privatization

RL and Ecology met and agreed to defer further discussions until after the contracts are awarded, which is expected to be on September 18 or 19. At that time, RL and Ecology will talk about alternate contract mechanisms and then HLW Privatization.

- Eight Reactors D&D

RL and Ecology will have a pre-negotiation meeting on September 17 or 19 to develop the principles for the AIP and an agenda for the upcoming negotiation meeting. All inputs for the September meeting are to be submitted to George Sanders by September 11, 1996.

- PFP (Added to Agenda)

RL and Ecology met early this morning and agreed to meet again on September 27. In preparation for the September meeting, George Sanders (RL) agreed to the following:

- a. Obtain a DOE-HQ response letter on the PFP strategy.
- b. Develop a PFP path forward flow chart.
- c. Provide additional information on the PFP materials.

Roger Stanley (Ecology) will write a draft AIP for RL review. No definite date has been established for the start of PFP negotiations.

## 5. TWRS Final EIS and Phase One Contract Issuance

- a. Phase One Contract Issuance will take place on September 18 or 19, when Tom Grumbly visits Hanford.
- b. The TWRS Final EIS was approved on August 22 and will be on the Federal Register August 30, 1996. This will start the 30 day clock to issue the ROD. A draft ROD will be in DOE-HQ by September 6, 1996.

There is one potential issue. The National Academy of Science (NAS) has not sent in any comments as of this date. It is anticipated the NAS will respond this week.

## **6. PHMC Introductions and Transition Briefing**

Julie Erickson (RL) opened the discussion and noted the high volume of activity in the transition period and there are only 34 days remaining. RL said the goal is to have a smooth transition of work from WHC to the PHMC and to maintain continuity of personnel. To that point, some offers have been extended to existing management personnel. However, some legal agreements have to be finalized for the transition.

RL introduced two Fluor Daniel Management Personnel; Larrie Trent, Vice President and Bill Adair, who will be managing compliance activities.

Larrie Trent spoke first and stressed the importance of interacting with the regulators. He also noted that the Tri-Party Agreement is at the heart of the Hanford business and because of its importance, the Tri-Party Agreement will be part of his organization. Larrie also discussed the importance of tracking contractor performance to Tri-Party Agreement requirements. Bill Adair followed and described his background in environmental compliance.

In the discussion which followed, both Ecology and EPA said when the time is right (after transition), the regulators would like to meet with Fluor Daniel and their principal sub-contractors and discuss their sub-contractor plan.

## **7. Change Request Discussion**

The change request P-06-96-02 "Revision of QA Documents in the Tri-Party Agreement" (Attachment 3) was distributed for discussion. The change request updates the QA documents referenced in the Tri-Party Agreement to the QA documents currently in use by the various projects.

There is one area where RL and Ecology have not completely reached an agreement. Ecology believes the Hanford Analytical Services Quality Assurance Plan (HASQAP) should be included in the Tri-Party Agreement. However, RL believes the HASQWAP is broader than the Tri-Party Agreement and would be an awkward document in the Tri-Party Agreement. RL noted the project workplans and QAP's will have regulator approval which would provide the regulators control of the quality requirements.

In the subsequent discussion, EPA said they will not be in a position to sign the change request because of an IG audit which is scheduled for September 18, 1996. After the IG report is issued, EPA will be prepared to discuss and possibly approve the change request at the October 22, 1996 IAMIT meeting.

It was decided the current committee consisting of RL, Contractor and regulator personnel continue working on the change request, and provide their input to Paul Carter (RL) and George Sanders (RL).

## 8. RIPI Proposal for Path Forward

Nancy Darling (WHC) discussed the RIPI proposal (Attachments 4A and 4B) and stressed the importance of IAMIT in helping to promote regulator streamlining and the use of the Regulatory Integration and Process Improvement (RIPI) Organization. Nancy discussed the various actions IAMIT could take but focused on three suggestions:

- a. Distribute guidance for regulatory streamlining.
- b. Use RIPI to resolve regulatory problems.
- c. Encourage organizations to promote the use of RIPI.

As a result of the continuing discussion, the following action item was assigned.

**Action:** Draft letter(s) for IAMIT issuance, to address the following RIPI topics:

- Encourage RIPI Involvement
- Identify team members
- Define the RIPI charter
- Provide guidance for RIPI involvement

**Resp.:** N. Darling

**Due:** September 24, 1996

RL also suggested enlisting Fluor Daniel in the process as one means of reducing costs.

## 9. MOU Between Ecology and Oregon DOE

Ecology noted the historical relationship and mutual support that has existed between the States of Washington and Oregon. The MOU (Attachment 5) was written to document the working relationship between the States with emphasis placed on communication. Ecology noted the MOU does not impact the actions of any Tri-Party Agreement party except that Ecology is committed to this agreement.

The following sections of the MOU were briefly discussed.

- Consultation and cooperation
- Meetings - Oregon will attend Tri-Party Agreement Milestone Reviews and the IAMIT meetings for topics related to Oregon (Public Involvement). Oregon will also attend Ecology project managers meetings held in the Kennewick Office.
- Correspondence
- Tri-Party Agreement Negotiations - Ecology will consult with Oregon
- Public Involvement - Ecology will consult with Oregon for public involvement activities in Oregon
- Points of Contact

It was noted the MOU is limited to Tri-Party Agreement activities. RL said they will review the MOU and report their findings to Ecology.

**10. Status of the Community Relations Plan (CRP)**

It was reported the public review period was completed on July 31, 1996. Public comments are being incorporated into the document and responses to the public comments are currently in draft. The CRP is expected to be issued by September 30, 1996 pending legal review.

There is a potential legal issue. The CRP is referenced by the Tri-Party Agreement and the CRP is referencing "other requirements" outside of the Tri-Party Agreement. Since the "other requirements" could be construed as part of the Tri-Party Agreement, the reference will be reviewed by RL legal.

**11. Audit of the Public Information Repositories**

This topic was deferred to the September 24 IAMIT meeting.

**12. Discussion of any Unresolved ER Issues**

There were no unresolved ER issues resulting from last weeks meeting. Ecology congratulated ER for involving Ecology in the MYWP process.

AGENDA ( \* Revised AUGUST 22, 1996)

IAMIT MEETING  
AUGUST 27, 1996  
EPA CONFERENCE ROOM  
712 SWIFT BLVD., STE. 5  
11:00 AM - 4:00 PM  
(CHAIRPERSON: C. A. HANSEN)

- 11:00 am \* APPROVAL OF JULY MEETING MINUTES
- 11:05 am \* APPROVAL OF FY97 IAMIT MEETING SCHEDULE (G. SANDERS, L. ARNOLD)
- 11:15 am \* IAMIT DIRECTIVE: DOE/RL & REGULATOR TPA MILESTONE PRESENTATIONS  
(M. WILSON, C. HANSEN, D. SHERWOOD, G. SANDERS)
- 11:20 am \* SUMMARY OF NEGOTIATION ISSUES AND SCHEDULES ( G. SANDERS, R. STANLEY)
- o K Basins
  - o TWRS HLW Privatization
  - o Eight Reactors D&D
- 11:40 am TWRS FINAL EIS AND PHASE ONE CONTRACT ISSUANCE  
(C. HAASS, W. TAYLOR, R. STANLEY)
- 12:00 pm LUNCH
- 1:00 pm PHMC INTRODUCTIONS & TRANSITION BRIEFING  
(J.K. ERICKSON, G. SANDERS, L. TRENT, W. ADAIR)
- 1:45 pm CHANGE REQUEST DISCUSSION
- o P-06-96-02 Revision of QA documents in the TPA  
(G.Sanders, C. Kasch, F.Calapristi, J.Yokel, M. Horhota)
- 2:05 pm RIPI PROPOSAL FOR PATH FORWARD (C. CLARK, N.DARLING)
- 2:30 pm BREAK
- 2:40 pm MOU BETWEEN ECOLOGY AND OREGON DOE ( M. WILSON, M.L. BLAZEK)
- 3:00 pm STATUS OF THE COMMUNITY RELATIONS PLAN (J.YERXA, M. WALLACE, D.FAULK)
- 3:20 pm AUDIT OF PUBLIC INFORMATION REPOSITORIES  
(G. SANDERS, F. CALAPRISTI)
- 3:35 pm DISCUSSION OF ANY UNRESOLVED ER ISSUES  
(M. WILSON, L.MCCLAIN, D. SHERWOOD)
- 4:00 pm ADJOURN

# ATTENDEES

## INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

AUGUST 27, 1996

EPA CONFERENCE ROOM  
712 SWIFT BLVD, RICHLAND

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>F.T. CALAPRISTI</u>	<u>WHE/TPAI</u>	<u>B2-35</u>	<u>✓</u>
<u>S.M. Alexander</u>	<u>Ecology</u>	<u>B5-18</u>	
<u>MA Selby</u>	<u>Ecology</u>	<u>B5-18</u>	<u>✓</u>
<u>Mike Wilson</u>	<u>Ecology</u>		<u>✓</u>
<u>Garry Gennard</u>	<u>WHE/TPAI</u>	<u>B2-35</u>	<u>✓</u>
<u>George Sanders</u>	<u>DOE-RL/EAP</u>	<u>A5-15</u>	<u>✓</u>
<u>Jim Rasmussen</u>	<u>DOE-RL/EAP</u>	<u>A5-15</u>	
<u>Doug Sherwood</u>	<u>EPA</u>	<u>B5-01</u>	<u>✓</u>
<u>DALE JACKSON</u>	<u>DOE-RL-EAP</u>	<u>A5-15</u>	
<u>ROGER STANLEY</u>	<u>Ecology</u>		
<u>Ron Skinnarland</u>	<u>Ecology</u>	<u>B5-12</u>	<u>✓</u>
<u>Peter Bengtson</u>	<u>WHE-COM</u>	<u>B3-35</u>	<u>✓</u>
<u>CAROLYN CHASS</u>	<u>RL-TURS</u>	<u>57-51</u>	
<u>Jessie Yokel</u>	<u>Ecology</u>	<u>B5-12</u>	



# ATTENDEES

## INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

AUGUST 27, 1996

EPA CONFERENCE ROOM  
712 SWIFT BLVD, RICHLAND

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>JOAN K BARTZ</u>	<u>ECOLOGY</u>	<u>B5-18</u>	
<u>George Sanders</u>	<u>DOE-RL/ERP</u>	<u>A5-15</u>	✓
<u>PAUL CARTER</u>	<u>DOE-RL ASF</u>	<u>S7-55</u>	
<u>DAVA FARWICK</u>	<u>WHE-QA</u>	<u>B1-16</u>	
<u>Michael Horvath</u>	<u>WHL-QA</u>	<u>B1-1C</u>	
<u>Nancy Darling</u>	<u>WHL</u>	<u>L204</u>	
<u>Mary Lou Blaylock</u>	<u>DOE-RL</u>		✓
<u>Jay Kinnmark</u>	<u>Ecology</u>	<u>B5-18</u>	✓
<u>Dennis Faulk</u>	<u>EPA</u>	<u>B5-01</u>	
<u>Petar Bengtson</u>	<u>WHL-com/PI</u>	<u>B3-35</u>	✓
<u>Cliff Clark</u>	<u>RL</u>	<u>A5-15</u>	

**DON'T SAY IT -- Write It!**

DATE: September 3, 1996

TO: Distribution

FROM: F. T. Calapristi WHC TPAI

Telephone: 376-6693

SUBJECT: Fiscal Year 1997 TPA Meeting Schedule

The following FY 97 TPA meeting schedule has been reviewed and approved by the DOE, EPA and Ecology IAMIT representatives. If there are any questions, I may be reached on 376-6693.

## Tri-Party Agreement Milestone Reviews

<u>Date</u>	<u>Milestones</u>	<u>IAMIT Chairperson</u>
October 22, 1996 (Tuesday)	TWRS Program Review: M-40, 41, 43, 44, 45, 46 M-50, 51 M-60, 61, 90	M. A. Wilson
November 19, 1996 (Tuesday)	M-13, 15, 16, 70 M-80, 81, 82, 83, 89	C. A. Hansen
December 17, 1996 (Tuesday)	M-18, 19, 26-01, 32, 34, 35 M-20, 24 M-91, 92	D. R. Sherwood
January 28, 1997 (Tuesday)	TWRS Program Review: M-40, 41, 43, 44, 45, 46 M-50, 51 M-60, 61, M-90	M. A. Wilson
February 25, 1997 (Tuesday)	M-13, 15, 16, 70 M-80, 81, 82, 83, 89	C. A. Hansen
March 25, 1997 (Tuesday)	M-18, 19, 26-01, 32, 34, 35 M-20, 24 M-91, 92	D. R. Sherwood
April 22, 1997 (Tuesday)	TWRS Program Review: M-40, 41, 43, 44, 45, 46 M-50, 51 M-60, 61, M-90	M. A. Wilson
May 27, 1997 (Tuesday)	M-13, 15, 16, 70 M-80, 81, 82, 83, 89	C. A. Hansen

# Tri-Party Agreement Milestone Reviews (continued)

<u>Date</u>	<u>Milestones</u>	<u>IAMIT Chairperson</u>
June 24, 1997 (Tuesday)	M-18, 19, 26-01, 32, 34, 35 M-20, 24 M-91, 92	D. R. Sherwood
July 29, 1997 (Tuesday)	TWRS Program Review: M-40, 41, 43, 44, 45, 46 M-50, 51 M-60, 61, M-90	M. A. Wilson
August 26, 1997 (Tuesday)	M-13, 15, 16, 70 M-80, 81, 82, 83, 89	J. E. Kinzer
September 23, 1997 (Tuesday)	M-18, 19, 26-01, 32, 34, 35 M-20, 24 M-91, 92	D. R. Sherwood

## IAMIT Meetings (Chairperson as noted above)

October 22, 1996  
November 19, 1996  
December 17, 1996  
January 28, 1997  
February 25, 1997  
March 25, 1997

April 22, 1997  
May 27, 1997  
June 24, 1997  
July 29, 1997  
August 26, 1997  
September 23, 1997

NOTE: The IAMIT and TPA Milestone Reviews are scheduled for the same day. However, in the event of time limitations, the TPA Milestone Review may be scheduled the day following the IAMIT meeting.



Tri-Party Agreement

## IAMIT DIRECTIVE

To the staff of: The U.S. Department of Energy, Richland Operations Office,  
The Washington State Department of Ecology, and  
The U.S. Environmental Protection Agency

REGULATOR PARTICIPATION IN PREPARATION OF MONTHLY HANFORD FEDERAL FACILITY  
AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE REVIEW  
PRESENTATIONS

In the July 23, 1996, Interagency Management Integration Team (IAMIT) meeting, representatives of the U.S. Department of Energy (DOE), Richland Operations Office (RL), the Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) discussed the role of regulator involvement in the preparation of Tri-Party Agreement Milestone Review presentations; referenced in TPA XLVIII, sub-paragraph 149 I.4 and TPA Action Plan Section 4.2. This guidance is forwarded to you as a description of agreements reached by the three parties. Site project managers and other appropriate staff are directed to immediately begin implementation by working with appropriate regulatory agency counterparts.

It was agreed that the Tri-Party Agreement Milestone presentations would be more meaningful if the project managers from the three parties worked together as DOE and DOE contractor presentations are prepared. The presentations will continue to be made by RL with the regulatory project managers having full knowledge of the presentation contents. At the completion of the RL presentation, the cognizant regulatory project manager will present a regulators assessment of the milestone status with the RL project manager having full knowledge of the regulator view.

By taking this action to increase three party interaction in the monthly milestone presentations, the result will be a mutual understanding of issues and improved communication to the IAMIT and program upper management regarding Tri-Party Agreement milestone status and/or issues. Implementing this new approach will not necessitate modification of Tri-Party Agreement language.

If there are any questions on this action, please contact your IAMIT representative signatory identified below.

C. A. Hansen, RL  
IAMIT Representative

M. A. Wilson, Ecology  
IAMIT Representative

D. R. Sherwood, EPA  
IAMIT Representative

## DRAFT

Change Number P-06-96-02	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date June 21, 1996
Originator F. T. Calapristi/ D. G. Farwick		Phone (509) 376-6857 (509) 376-8557
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Revision of Quality Assurance Document Requirements in The TPA		
Description/Justification of Change <p>The Quality Assurance (QA) documents referenced by the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) need revising to meet the current needs of Hanford Programs including the privatization effort. The attached pages show in detail the proposed changes to Amendment 6 of the Hanford Federal Facility Agreement and Consent Order:</p>		
Impact of Change <p>The current requirements work very well for data and sample collection, and analysis and evaluation activities. However, application of these same requirements to engineering, maintenance, construction, operations, or decontamination and decommissioning activities is awkward, and at times inadequate for the work to be achieved. These changes will be more tolerant to a number of recognized industry standards for quality and allow the contractor to select appropriate standards based upon the type of work being performed.</p>		
Affected Documents <p>Hanford Federal Facility Agreement and Consent Order Section 6 (Treatment, Storage, and Disposal Unit Process), Section 7 (Past Practices Processes) and Section 9 (Documentation and Records).</p>		
Approvals		
J. Rasmussen DOE	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
D. Sherwood EPA	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
M. Wilson Ecology	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved

Sections 6.5, 7.8 and 9.6.3 will be changed as follows:

## 6.5 QUALITY ASSURANCE

The level of quality assurance and quality control (QA/QC) for the collection, preservation, transportation, and analysis of each sample which is required for implementation of this Agreement shall be dependent upon the data quality objectives for the sample. Such data quality objectives shall be specified in RCRA closure plans, the RCRA permit, and any other relevant plans that may be used to describe sampling and analyses at RCRA TSD units.

The QA/QC requirements shall range from those necessary for non-laboratory field screening activities to those necessary to support a comprehensive laboratory analysis that will be used in final decision-making. ~~This range of QA/QC options is included in the "Data Quality Strategy for Hanford Site Characterization" (as listed in Appendix F). This document is subject to approval by EPA and Ecology.~~

Based upon the data quality objectives, the DOE shall comply with applicable EPA guidance documents for QA/QC and sampling and analysis activities ~~which are taken to implement the Agreement as incorporated into regulator approved planning documents or permits. Examples of~~ such guidance includes:

- ~~"Guidelines and Specifications for Preparing Quality Assurance~~ Program Plans"  
~~(QAMS 004/80);~~
- "Interim Guidance and Specifications for Preparing Quality Assurance Project Plans" (QAMS-005/80);
- ~~"Data Quality Objectives for Remedial Response Activities"~~  
~~(EPA/540/G-87/003 and 004) "Guidance for the Data Quality Objectives Process" (EPA~~  
~~QA/G-4); and~~
- "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods"  
(EPA/SW-846).

In some instances, RCRA TSD units are included in operable units and are scheduled for investigation and closure as part of the operable unit remedial action. DOE shall follow the provisions of Section 7.8 for QA/QC for sampling and analysis activities at these land disposal units.

In regard to QA requirements for construction of RCRA land disposal facilities, DOE shall comply with "Technical Guidance Document: ~~Construction Quality Assurance for Land Disposal Facilities" (EPA/530 SW 86 031) Quality Assurance and Quality Control for Waste Containment Facilities" (EPA/600/R-33/182).~~

~~For analytical chemistry and radiological laboratories, the QA/QC plans must include the elements listed in "Guidance on Preparation of Laboratory Quality Assurance Plans" (as listed in Appendix F).~~ DOE shall submit laboratory QA/QC plans to the lead regulatory agency for review as secondary documents prior to use of that laboratory. In the event that DOE fails to demonstrate to the lead regulatory agency that data generated pursuant to this Agreement was obtained in accordance with the QA/QC requirements of this section, including laboratory QA/QC plans, DOE shall repeat sampling or analysis as required by the lead regulatory agency. Such action by the lead regulatory agency shall not preclude any other action which may be taken pursuant to this Agreement. For other data, the lead regulatory agency may request DOE to provide QA/QC documentation. Any such data that does not meet the QA/QC standard required by this section shall be clearly flagged and noted to indicate this fact.

## 7.8 QUALITY ASSURANCE

The level of quality assurance and quality control (QA/QC) for the collection, preservation, transportation, and analysis of each sample which is required for implementation of this Agreement shall be dependent upon the data quality objectives for the sample. Such data quality objectives shall be specified in RI/FS or RFI/CMS work plans or in other work plans that may be used to describe sampling and analyses at CERCLA or RCRA past-practice units.

The QA/QC requirements shall range from those necessary for non-laboratory field screening activities to those necessary to support a comprehensive laboratory analysis that will be used in final decision-making. ~~This range of QA/QC options is included in the "Data Quality Strategy for Hanford Site Characterization" (as listed in Appendix F). This document is subject to approval by EPA and Ecology.~~

Based upon the data quality objectives, the DOE shall comply with applicable EPA guidance documents for QA/QC and sampling and analysis activities which are taken to implement the Agreement as incorporated into regulator approved planning documents or permits. Examples of such guidance includes:

- ~~• "Guidelines and Specifications for Preparing Quality Assurance Program Plans" (QAMS-004/80);~~
- "Interim Guidance and Specifications for Preparing Quality Assurance Project Plans" (QAMS-005/80); and
- ~~"Data Quality Objectives for Remedial Response Activities" (EPA/540/G-87/003 and 004);~~ "Guidance for the Data Quality Objectives Process" (EPA QA/G-4).

In regard to quality assurance requirements for construction of land disposal facilities, DOE shall comply with "Technical Guidance Document: ~~Construction Quality Assurance for Land Disposal Facilities" (EPA/530-SW-86-031);~~ Quality Assurance and Quality Control for Waste Containment Facilities" (EPA/600/R-33/182).

~~For analytical chemistry and radiological laboratories, the QA/QC plans must include the elements listed in "Guidance on Preparation of Laboratory Quality Assurance Plans" (as listed in Appendix F).~~ DOE shall submit laboratory QA/QC plans to EPA and Ecology for review as secondary documents prior to use of that laboratory. In the event that DOE fails to demonstrate to the lead regulatory agency that data generated pursuant to this Agreement was obtained in accordance with the QA/QC requirements of this section, including laboratory QA/QC plans, DOE shall repeat sampling or analysis as required by the

lead regulatory agency. Such action by the lead regulatory agency shall not preclude any other action which may be taken pursuant to this Agreement. For other data, the lead regulatory agency may request DOE to provide QA/QC documentation. Any such data that does not meet the QA/QC standards required by this section shall be clearly flagged and noted to indicate this fact.

### 9.6.3 Validation

Data validation shall be performed in accordance with approved sampling and analysis plans and quality assurance project plans (QUAPjPs) (QAPjPs). ~~Laboratory analytical data validation procedure shall incorporate Data Validation Guidelines for Contract Laboratory Program Organic Analyses and Data Validation Guidelines for Contract Laboratory Program Inorganic Analyses.~~ The DOE shall make available to EPA and Ecology validated and unvalidated laboratory analytical data. Any document produced by any of the three parties which contains unvalidated or otherwise caveated data shall be marked as such. Documents produced by any of the three parties that contain laboratory data will have the data designated as validated or unvalidated.

~~The lead regulatory agency shall be notified of the availability of laboratory analytical data via electronic mail, facsimile transmission, or other means as agreed by the parties involved. Notification shall occur within one week of data entry and shall include the following information:~~

- ~~• date(s) of collection~~
- ~~• unit(s) where data collected~~
- ~~• type of data, e.g., ground water~~
- ~~• location of where data is stored, e.g., database~~
- ~~• unique identifier given to each piece of data, e.g., sample ID.~~



DON'T SAY IT--WRITE IT!!!

DATE: August 8, 1996

TO: IAMIT Committee

FROM: Nancy Darling/WHC  
Doug Mosich/Ecology  
Cliff Clark/RL

SUBJECT: FUTURE ROLE OF RIPI

As requested at the July IAMIT Meeting, we have put together the attached draft proposal on RIPI's Future Role at Hanford. The proposal addresses the status and future direction of RIPI's three current tasks:

1. Track and Document Regulatory Streamlining Successes
2. Encourage Regulatory Streamlining at Hanford
3. Develop and implement a formal issue resolution process for issues not addressed under the TPA dispute resolution process.

For each task, the proposal outlines;

- A) Accomplishments to Date
- B) Proposed Future Role
- C) Actions Needed by RIPI
- D) Actions Needed by IAMIT

Since the proposal is 6 pages long, you can streamline your reading activity by focusing on parts B) Proposed Future Role and D) Actions Needed by IAMIT for each of the three tasks. These are the sections we will need IAMIT's feedback on at the August meeting.

We would like to come away from the August meeting with the go-ahead by IAMIT to pursue our proposed future role and get feedback on which of the actions needed by IAMIT you support. In particular, we would like direction to begin drafting a joint letter from IAMIT to staff which supports RIPI's regulatory streamlining role at Hanford.

Thanks for your time and effort in helping us to make the RIPI Team a valuable part of regulatory streamlining at Hanford.

We will see you August 27.

RIPI's Regulatory Streamlining Role at Hanford  
Draft Proposal  
August 5, 1996

I. Purpose

The purpose of this proposal is to assist IAMIT in defining and supporting RIPI's current and future role in regulatory streamlining at Hanford.

II. Background

The Regulatory Integration and Process Improvement (RIPI) Team was formed in 1994 in response to the Tri-Party Agreement's Cost and Management Efficiency Initiative. A charter was signed by RI and it's contractors, Ecology, EPA and WDOH which directs RIPI to do the following:

1. Track and Document Regulatory Streamlining Successes
2. Encourage Regulatory Streamlining at Hanford
3. Develop and implement a formal issue resolution process for issues not addressed under the TPA dispute resolution process.

III. Status and Future Direction of RIPI

Tracking and Documenting Successes

A. Accomplishments to Date

RIPI developed and maintains the RIPI Success Inventory (Inventory) which documents regulatory streamlining successes at Hanford. Regulatory streamlining successes are actions resulting from a streamlining or innovative application of a regulation which results in a cost savings and has been agreed upon by the appropriate parties. Successes to the Inventory can be submitted by RI and it's contractors, Ecology, EPA, and WDOH. To date there are 104 successes in the Inventory. Over \$90 million in cost avoidances and \$1.5 million in hard dollar savings have been calculated. The inventory is updated every four months and hard copies are maintained throughout the site. Approximately 30 more successes are expected to be submitted to the Inventory by the end of FY 96.

B. Proposed Future Role

It is proposed that RIPI continue to maintain the Inventory while increasing efforts to solicit documented successes, calculate cost savings, update Inventory Forms as needed, and make the Inventory more accessible to staff.

C. Actions Needed by RIPI Team

To implement the proposed future role, actions needed by the RIPI Team are:

1. Obtain and provide to staff fully burdened labor rates and other direct costs for RL, Contractors, EPA, Ecology and WDOH so that total cost savings can be calculated to include all parties reduced costs associated with a particular streamlining success.
2. Revise Inventory Form to highlight all parties responsible for a streamlining success (Completed 7/26/96).
3. Institute process for cross party review for successes submitted to the Inventory.
4. Make the Inventory more accessible to staff.
  - o Include a key word index which divides successes by type (air, water, RCRA, CERCLA, etc.)
  - o Make Inventory available on HLAN
5. Provide recognition for staff.
  - o Work with REACH to regularly publish names of staff/organizations responsible for streamlining successes.
  - o Meet with individual organizations to explain RIPI tracking and documentation process

D. Actions Needed by IAMIT

1. Require that streamlining be reported to the RIPI Team.
2. Encourage Managers to make reporting of streamlining successes a part of regularly scheduled staff meetings.
3. Give incentive/recognition for regulatory successes. This could include letter to contributors, certificates, recognition luncheon, etc.
4. Encourage organizations to set regulatory streamlining goals (i.e. 5 streamlining successes submitted to the Inventory quarterly).

Encourage Regulatory Streamlining at Hanford

A. Accomplishments to Date

The RIPI Team has encouraged streamlining at Hanford through the following actions:

- o Meeting with organizations to promote streamlining
- o Several articles in the REACH
- o Working with WHC Environmental Services to provide recognition (certificates) to staff for streamlining successes.
- o Working with WHC Environmental Services on accountability of regulatory streamlining (WHC ES has a specific Award Fee Element to produce a certain number of streamlining successes)
- o In February 1996, held a session on regulatory streamlining to define barriers and solutions. The session was attended by over 40 staff/management representing RL, contractors, Ecology, EPA, and WDOH.
- o Distributed a survey to Ecology on how to improve regulatory streamlining at Hanford.
- o Included a specific section on Regulatory Streamlining in the Environmental Bi-Weekly Report (EWR).

B. Proposed Future Role

The RIPI Team should increase efforts to encourage regulatory streamlining at Hanford. This includes more visibility for the RIPI Team and better promotion of its services. Increased efforts should also include making it easier for staff to promote regulatory streamlining ideas.

C. Actions Needed by RIPI

1. Implement actions to improve tracking and documenting streamlining successes (listed above).
2. Attend 5 staff meetings in FY 97
3. Serve as a "Clearing House" for regulatory streamlining ideas. Staff will be encouraged to send regulatory streamlining ideas to RIPI. The Clearing House concept is different than RIPI's issue resolution process. Unlike the issue resolution process which relies on mediation to address differences and achieve streamlining results, the Clearing

House concept focuses only on gathering and promoting regulatory streamlining ideas.

Here's how it works. When streamlining ideas are received, the RIPI team will review the idea and promote it if it has merit and is likely to achieve streamlining results. Follow through will include bringing the appropriate parties together to build consensus for the idea. The idea is then promoted to IAMIT or other appropriate management team. Streamlining ideas that involve statutory and/or regulatory changes are beyond the scope of the RIPI Clearing House concept. However, RIPI will make an effort to pass along such ideas to the IAMIT or other appropriate group.

Getting staff to submit regulatory streamlining ideas will be challenging. RIPI proposes to use staff meetings and the REACH to actively solicit ideas. The REACH can also be used to recognize people whose ideas are implemented.

4. Communicate more often with Regulatory Streamlining Monitors.

D. Actions Needed by IAMIT

1. Encourage use of RIPI as a Clearing House for streamlining ideas through a letter to management and staff.

2. Encourage managers to make streamlining an expected job task by putting it in job expectations.

3. Distribute guidance that helps staff evaluate streamlining proposals. This guidance should define regulatory streamlining, address what "appropriate risk" is, discuss what constitutes legally defensible, establish some common definitions for staff including cost effectiveness, appreciable environmental benefit, etc., and strongly encourages regulatory streamlining.

4. Establish recognition/incentive programs for management and staff that are promoting and implementing streamlining. This might include showcasing individuals in the REACH, IAMIT letter to individuals applauding streamlining efforts, awards luncheon with senior management, encouraging managers to recognize streamlining efforts during performance evaluations, etc..

5. Develop joint priorities and goals between tri-parties for regulatory streamlining.

6. Sponsor and support team building sessions for staff to promote increased trust between parties.

7. Provide guidance to staff to encourage open, honest and up-front discussions between the parties.

8. Establish twice yearly evaluations between the parties on regulatory streamlining to assess the progress of streamlining at Hanford.

### Issue Resolution Process

#### A. Accomplishments to Date

The 1994 RIPI Charter established a formal issue resolution process. This process could be used by staff to help expedite the resolution of issues that were either not subject to or not suitable for the TPA Dispute Resolution Process. Staff could request the assistance of the RIPI Team to help mediate an issue if resolution was not taking place at the staff level. The RIPI Team would then assist the parties in resolving the issue. The RIPI Team acts as a mediator, not a decision-maker. RIPI simply helps the parties come to resolution. RIPI elevates issues requiring senior management involvement to IAMIT.

Although staff has repeatedly voiced the need for such a process, it has been used very little. There are several reasons. One is that issues are being resolved more readily at the staff level. Other reasons include staff being unaware of the issue resolution process, no urgency on staff's part to resolve issues in a timely manner, the perception of failure if outside help is needed to resolve an issue, and the lack of direction by management for staff to use the issue resolution process.

#### B. Future Direction

On July 9, RL distributed a memorandum on the Efficiency Issue Resolution (EIR) Process. The EIR process was developed through collaboration between RL, Ecology and EPA to deal with the improvement of cost and efficiency issues raised by Dan Silver in a June 9, 1995 letter. This process requires efficiency issues to be documented on a worksheet and to be a regular agenda item for each project's monthly review. For those issues that cannot be resolved at the monthly project review, existing improvement processes will be used to help resolve the issue. Issues that need senior management involvement will be elevated to IAMIT for resolution.

The EIR Process fits well with the RIPI Issue Resolution process. It is proposed that the RIPI Team, along with other improvement processes (reengineering, WESTIP, etc.) be recognized and utilized when the issue cannot be resolved at the project monthly review meetings. RIPI could be called upon when the issue centers around using a streamlining or innovative application of the regulation. If RIPI cannot successfully assist in facilitating resolution, it would elevate the issue to IAMIT.

The greatest challenge in ensuring RIPI involvement will be simply to get involved in the first place. This challenge can be addressed

through better marketing of RIPI's services and active support of RIPI involvement by IAMIT.

C. Actions Needed by RIPI

1. Meet with Projects to familiarize staff with RIPI's services and to actively pursue involvement in regulatory streamlining issues.
2. Advertise services in the REACH.

D. Actions Needed by IAMIT

1. Distribute guidance explaining and supporting RIPI's role in issue resolution, both within the context of the efficiency issue resolution process and independent of that process.
2. Provide appropriate issues for resolution to RIPI.
3. Promote RIPI's role in dispute resolution to staff, management, and stakeholders through staff meetings, presentations to stakeholders, etc.

August 12, 1996

(ATTACHMENT 5)

**A LETTER TO THE STAFF OF THE OREGON DEPARTMENT OF ENERGY AND  
THE WASHINGTON DEPARTMENT OF ECOLOGY REGARDING CONSULTATION  
AND COOPERATION ON HANFORD ENVIRONMENTAL ISSUES.**

For the past eight years the states of Oregon and Washington have worked together closely to further the cleanup of the Hanford Site. This relationship recognizes that Hanford's wastes and environmental contamination pose a risk to the health and well-being of the people of both our states and that by working together we can help to ensure more effective and efficient cleanup.

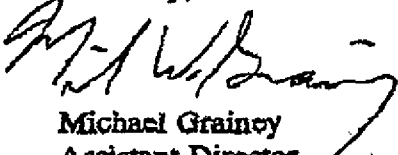
Together, we have been able to garner essential congressional support for Hanford cleanup funding and associated cleanup legislation such as the Federal Facility Compliance Act. Consultation between our states has also been important in setting cleanup priorities, conducting Tri-Party Agreement negotiations, and addressing technical issues.

With the growth of Ecology's Nuclear Waste Program and as cleanup efforts move into the field, we believe it is time to take steps to ensure our working relationship remains strong and viable. The key element in this relationship is communication. Our communications must be open, frequent, and responsive at all levels. We should work to achieve consensus and to forge joint positions when possible. While we may periodically disagree, our individual actions or positions should not catch the other state by surprise.

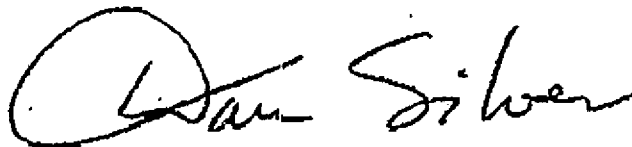
The responsibility for ensuring good communications falls on each of us individually and collectively. The Nuclear Waste Program Manager, the Program Management Team, unit supervisors, and project managers all bear the responsibility for raising key cleanup issues with their Oregon Department of Energy (ODOE) counterparts. ODOE staff share this responsibility to raise issues of concern promptly with Ecology staff. Staff should not wait for a call or inquiry, they should initiate contact if they have an issue which they believe may be of concern or interest to the other state.

In support of this general direction and guidance, we have agreed to take several specific steps to improve communication and cooperation. These steps are outlined in the enclosure and take effect immediately.

Sincerely,



Michael Grainey  
Assistant Director  
Oregon Department of Energy



Dan Silver  
Assistant Director  
Waste Management Division  
Washington Department of Ecology

cc: Doug Sherwood, EPA  
Jim Rasmussen, DOE-RL



**AGREEMENT ON  
OREGON/WASHINGTON  
COOPERATION ON HANFORD CLEANUP  
August 12, 1996**

**1. Consultation and Cooperation.**

The Washington Department of Ecology (Ecology) and the Oregon Department of Energy (ODOE) agree to consult and, wherever possible, cooperate on Hanford environmental issues. Ecology and ODOE will attempt to reach consensus on actions needed to address these issues. To accomplish this:

- a. Ecology will work to ensure that ODOE has the information and the opportunity needed to adequately review and comment on Hanford environmental issues and proposed actions before decisions are made;
- b. ODOE will advise Ecology of its issues of concern and recommendations. To assist ODOE in formulating timely responses, Ecology will request USDOE and EPA to provide ODOE with simultaneous copies of all information provided to Ecology pursuant to the requirements of the Hanford Federal Facility Agreement and Consent Order, commonly referred to as the Tri-Party Agreement or TPA; except information related to dispute resolution, negotiations, enforcement, or Washington State cost recovery. ODOE agrees to provide Ecology with information related to Hanford environmental activities which it has received and Ecology has not; and
- c. Ecology and ODOE will attempt to resolve ODOE concerns within established decision-making timeframes in order to avoid any delay of cleanup or waste management work. Both parties will commit adequate time to meet or otherwise discuss ODOE concerns and recommendations.

**2. Meetings.**

**a. Senior Management Meetings**

Senior managers from Ecology and ODOE will meet every other month beginning in August 1996. The purpose of these meetings will be to discuss key policy issues, to develop joint strategies and positions, and to review cooperative efforts. Ecology representatives will include the members of the Nuclear Waste Program Management Team and, when appropriate, the Assistant Director for Waste Management. ODOE representatives will include the ODOE Nuclear Safety Division Administrator and/or her designee(s) in the ODOE Nuclear Safety Division, and, when appropriate the ODOE Assistant Director or Director.

The agenda for such meetings will be developed by the designated point of contact for each agency. Meeting locations will be alternated between Oregon and Washington to the extent practical.

**b. Milestone Review and IAMIT Meetings.**

ODOE staff may attend all milestone review sessions. Ecology will support ODOE attendance at IAMIT meetings for agenda items of interest to Oregon and not related to dispute resolution, negotiations, and enforcement matters. The Oregon point of contact shall be placed on the distribution list for agenda and minutes for such meetings.

**c. Project Managers' Meeting.**

ODOE staff may attend and participate in all Ecology Nuclear Waste Program Project Managers' meetings. The point of contact shall be provided an agenda one week prior to each meeting and shall receive copies of any minutes prepared.

**3. Correspondence.**

Ecology will place ODOE on the distribution list for all TPA correspondence it forwards to the Environmental Protection Agency (EPA) and to USDOE and its contractors. Ecology will request that EPA and USDOE also routinely include ODOE on distribution for their TPA correspondence.

Ecology will support ODOE access to the electronic mail system (cc:mail) used by Ecology, USDOE and its contractors, and EPA.

**4. Tri-Party Agreement Negotiations.**

Ecology will consult regularly with ODOE before and during TPA negotiations. Ecology will arrange to meet with ODOE during negotiating sessions, where necessary, to discuss the progress and direction of the negotiations and will encourage EPA and USDOE to join in such meetings. The purpose of this consultation will be to keep ODOE apprised of issues and negotiation progress, to understand Oregon's concerns, and to attempt to develop a negotiating strategy that adequately addresses Oregon's concerns.

**5. Public Involvement.**

Ecology will consult with and include ODOE in planning and conducting any Hanford-related public involvement activities in Oregon. Ecology and ODOE will work together to ensure that public involvement activities in Oregon are cost effective and satisfy legal requirements and public interests.

Ecology will seek ODOE concurrence on plans for Hanford public involvement in Oregon for which Ecology has sole responsibility. In the case of TPA public involvement activities where responsibility is shared by Ecology, EPA, and USDOE, Ecology will urge that the three parties jointly seek ODOE concurrence.

ODOE staff will be invited to participate in three party efforts to plan public involvement activities, including periodic meeting of public involvement staff. ODOE agrees to work

jointly with the three agencies in planning TPA public involvement activities in Oregon. ODOE further agrees to keep all three parties fully apprised of the interests and concerns relating to such involvement activities.

To the extent ODOE takes on additional public involvement activities at the request of the TPA parties, Washington will support USDOE funding to support the work requested of ODOE.

6. **Points of Contact.**

The Ecology point of contact for overseeing this cooperative effort is Roger Stanley. The Oregon point of contact is Mary Lou Blazek. In addition to the specific responsibilities laid out in this letter, the contacts will be responsible for general facilitation of our cooperative efforts. Staff should address any questions or concerns regarding consultation and cooperation to the contacts.